

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

THE PUBLIC INTEREST LEGAL FOUNDATION,	:	
	:	
	:	
Plaintiff,	:	1:20-CV-1905
	:	
v.	:	ELECTRONICALLY FILED
	:	
KATHY BOOCKVAR, Secretary of the Commonwealth of Pennsylvania, in her official capacity,	:	CHIEF JUDGE JONES
	:	
	:	
Defendant.	:	

**MOTION FOR ENLARGEMENT OF DEADLINE
TO FILE REPLY BRIEF**

Defendant Kathy Boockvar, by and through her undersigned counsel, hereby moves for a brief enlargement of time to file her reply brief in further support of her motion to dismiss the Amended Complaint in the above-captioned matter and, in support thereof, avers as follows:

1. Secretary Boockvar moved to dismiss Plaintiff The Public Interest Legal Foundation's ("PILF") Amended Complaint on November 19, 2020 (ECF No. 31) and filed her supporting brief on December 3, 2020 (ECF No. 32).
2. PILF filed its brief in opposition on December 14, 2020 (ECF No. 33).
3. Pursuant to Local Rule 7.7, Secretary Boockvar's reply brief is due to be filed on Monday, December 27, 2020.

4. Due to health issues affecting staff and the Christmas holiday, the undersigned counsel for Secretary Boockvar respectfully requests a 10-day enlargement of time until January 7, 2021 to file her reply brief in support of the motion to dismiss.

5. Counsel for PILF concurs in this motion.

WHEREFORE, Secretary Boockvar respectfully requests a ten-day enlargement of time until January 7, 2021 to file her reply brief.

Respectfully submitted,

/s/ Daniel T. Brier
Daniel T. Brier
Donna A. Walsh
Suzanne Conaboy Scanlon

Counsel for Defendant,
Secretary Kathy Boockvar

Myers, Brier & Kelly, LLP
425 Spruce Street, Suite 200
Scranton, PA 18503
(570) 342-6100

December 23, 2020

CERTIFICATE OF CONCURRENCE

I, Donna A. Walsh, hereby certify that I sought the concurrence of counsel for Plaintiff, Linda A. Kerns, in this Motion. Ms. Kerns concurs in this motion.

/s/ Donna A. Walsh

Date: December 23, 2021

CERTIFICATE OF SERVICE

I, Donna A. Walsh, hereby certify that a true and correct copy of the foregoing Motion for Enlargement of Deadline To File Reply Brief was served upon the following counsel of record via the Court's ECF system on this 23rd day of December 2020:

Linda A. Kerns, Esquire
Law Offices of Linda A. Kerns, L.L.C.
1420 Locust St., Ste. 200
Philadelphia, PA 19102

Sue Becker, Esquire
Public Interest Legal Foundation
32 E. Washington Street, Suite 1675
Indianapolis, IN 46204

John Eastman, Esquire
Center for Constitutional Jurisprudence
c/o Chapman University Fowler School of Law
One University Drive
Orange, CA 92866

Bradley J. Scholzman, Esquire
Hinkle Law Firm
1617 N. Waterfront Parkway, Ste. 400
Wichita, KS 67206-6639

/s/ Donna A. Walsh